UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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May 31, 2013

Inland Environment Team
Planning and Environmental Division
Environment and Resources Branch
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288, Mobile, AL 36628–0001;

Attention: Mr. Chuck Sumner - Biologist

Subject: EPA Comments on the Draft Environmental Impact Statement (DEIS) for the Update of the Water Control Manual for the Alabama-Coosa-Tallapoosa (ACT) River Basin; Alabama and Georgia.
CEQ #: 20130045; ERP #: COE-39188-00

Dear Mr. Sumner:

Pursuant to Section 309 of the Clean Air Act (CAA) and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) reviewed the Draft Environmental Impact Statement (DEIS) Update of the Water Control Manual (WCM) for the proposed project. EPA participated in a public scoping and public meeting held on October 22, 2008, and March 25, 2013, respectively, as well as two interagency webinars on September 11, 2008, and April 2, 2013. This letter is intended to provide EPA's comments on the proposed project.

The purpose of the project is to update the WCM for the Alabama-Coosa-Tallapoosa (ACT) River Basin. The operations at each federal reservoir managed by the U.S. Army Corps of Engineers (USACE) are described in a WCM, which includes WCMs for the operation of the ACT Basin and for the individual USACE projects within that system. The WCM describes how federal projects within the basin should operate in order to meet their authorized purposes. The WCM should provide for operations that meet state water quality standards, particularly where the authorized purpose of the project is water quality.

The updates to the WCM are intended to reflect conditions that have changed since the previous WCM was completed in 1951, and before many of the reservoir projects in the system were completed. These conditions may include changes due to current basin hydrology, legal mandates, environmental considerations or alterations due to structural features. Some individual reservoir manuals have been updated, but the master WCM has not been comprehensively updated. The WCM includes a new drought contingency plan to address water management issues during periods of drought.

According to the DEIS, the ACT Basin provides water resources for multiple purposes and encompasses a 22,800 square mile area in Alabama and Georgia. There are 17 major dams located in the Basin. The USACE owns and operates six of these dams (Allatoona Dam on Allatoona Lake on the Etowah River in Georgia; Carters Dam and Carters Reregulation Dam on Carters Lake on the Coosawattee River in Georgia; Robert F. Henry Lock and Dam and on R.E Woodruff Lake, Millers Ferry Lock and Dam on William Dannelly Lake, and Claiborne Lock and Dam on the Alabama River in Alabama). The USACE also has flood risk management responsibilities at four Alabama Power Company reservoirs (Weiss, H. Neely Henry, and Logan Martin Lakes on the Coosa River; and Harris Lake on the Tallapoosa River).

The authorized project purposes at the USACE dams include flood risk management, hydropower, navigation, water supply, water quality, fish and wildlife conservation, and recreation. Other non-Federal dams located on the Coosa and Tallapoosa Rivers include 11 projects owned and operated by the Alabama Power Company. Operations between the Alabama Power Company (APC) projects and the federal projects are coordinated as necessary to meet flood control, water quality and quantity, and water supply demands. For example, in order for the USACE to develop an effective drought contingency plan for the basin, APC projects had to be incorporated into the plan since these project store 78 percent of the water resources.

Impoundments can fragment aquatic ecosystems, with impacts on many aspects of environmental integrity, particularly when the cumulative effects of multiple impoundments across a system are taken into account. Although the projects subject to the WCM are already in place, the allocations and uses allowed and established through the WCM revision can have significant influence on overall ACT system health by preventing or minimizing further fragmentation.

Based on the review of the DEIS, EPA's comments relate primarily to the potential water resource, biological resource and socioeconomic impacts associated with the proposed action. In summary, EPA recommends that consideration be given to maximizing the use of existing infrastructure in the ACT Basin in an effort to minimize aquatic resource impacts including impacts to wetlands and streams within the basin; requiring the implementation of water efficiency or conservation measures as the primary alternative before commitments are made for supply or storage uses; and ensuring the WCM operations meet water quality standards, including downstream uses and adequate flows to maintain the physical integrity of the habitat. Climate change also has the potential to impact water supply, water quality, flood risk, wastewater, aquatic ecosystems, and energy production. The Final Environmental Impact Statement should consider the impact of dam operations in the Basin on greenhouse gases and climate change, as well as the impacts of climate change on WCM operations. An adaptive management approach would most effectively address climate related issues.

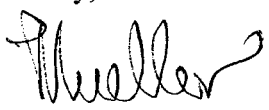
EPA appreciates the consideration of environmental and socioeconomic impacts on children, and low-income and minority populations. According to the DEIS, significant environmental justice (EJ) concerns were not identified during the scoping process. In an effort to adequately ensure that the proposed project does not affect these communities, it is important to meaningfully engage them throughout the decision-making process and to ascertain whether resources of importance may be affected. Efforts to identify populations with EJ concerns that

may engage in subsistence activities within the basin should be discussed and EJ comments along with the USACE's responsiveness should be documented in the Final Environmental Impact Statement (FEIS). In addition, EPA recommends that enhanced warning systems be reviewed and implemented in an effort to improve public safety and recreation for all users. This is especially important in areas that have higher levels of children living within the basin and using the resources.

EPA has rated the preferred alternative as "EC-2," environmental concerns with additional information requested for the final document. EPA's review has identified environmental impacts that should be avoided or minimized in order to adequately protect the environment. The FEIS should demonstrate responsiveness to these comments.

We appreciate the opportunity to provide comments on the proposed WCM DEIS for the ACT River Basin. We also appreciate the ongoing efforts to coordinate with us during the public comment period. If you have any questions regarding our comments, please contact Ntale Kajumba (404/562-9620) of my staff or the Water Protection Division technical coordinators on technical issues (See Detailed Attachment).

Sincerely,



Heinz J. Mueller, Chief
NEPA Program Office
Office of Environmental Accountability

Attachments: EPA Detailed Comments
EPA Rating System

EPA's Detailed Comments on the Water Control Manual DEIS for the ACT River Basin

Alternatives

The DEIS addresses a no action and three action alternative (Plan A, Plan F and Plan G). The no-action alternative involves no change in how the dams are currently managed. The USACE's preferred alternative (Plan G) is identified in the DEIS. The proposal includes the following:

- **Implements Basin Drought Operations Plan:** includes triggers and dam releases/flow targets to conserve storage and provide reduced levels of service during drought
- **Navigation Plan:** includes triggers to reduce (9.0' or 7.5' channel) or suspend navigation level of service based on system storage
- **Minimum Flows:** implements seasonal minimum flows at Carters when reservoir storage level supports
- **Hydropower:** variable hydropower generation at Allatoona based on action zone and time of year
- **Revised Guide Curves:** H. Neely Henry (APC) and Allatoona
- **Revised Action Zones:** Allatoona and Carters
- **Water Supply:** no change in existing contracted amounts
- **Alabama Power Company Projects (APC):** continued operation under current FERC licenses

Recommendations: EPA appreciates that a preferred alternative was identified in the DEIS (Plan G). EPA rated the preferred alternative as "EC-2," environmental concerns with additional information requested for the final document. EPA's review has identified environmental impacts that should be further avoided /minimized in order to adequately protect the environment. The FEIS should demonstrate responsiveness to the comments below.

Water Resources

Wetlands and Streams

As described in the DEIS, the purpose and need for the federal action is to "determine how the federal projects in the ACT Basin should be operated for their authorized purposes, in light of current conditions and applicable law, and to implement those operations through updated water control plans and manuals."

The alternatives considered for management of water supply can significantly influence the alternatives that entities can in turn consider when assessing how to meet water supply needs. With effective management, many allocations and uses can be met with existing infrastructure,

whereas new infrastructure or projects such as reservoirs could have greater impacts to environmental resources. When such projects require CWA Section 404 permits, they must meet the requirements of the regulations at 40 CFR Part 230, also known as the Section 404(b)(1) Guidelines. One of the key requirements of the Section 404(b)(1) Guidelines is that no such work shall be permitted if there is "a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences" (40 CFR § 230.10(a)), if it would "cause or contribute to significant degradation of the waters of the United States" (40 CFR § 230.10(c)), and "unless appropriate and practicable steps have been taken which will minimize potential adverse impacts of the discharge on the aquatic ecosystem" (40 CFR § 230.10(d)). In accordance with the Section 404(b)(1) Guidelines, the WCM should facilitate holistic management of basin resources such that the total impact is minimized, and entities seeking water allocations and uses have access to alternatives that are the least environmentally damaging both in a local context and on a basin scale whenever possible.

Impoundments can fragment aquatic ecosystems, with impacts on many aspects of environmental integrity, particularly when the cumulative effects of multiple impoundments across a system are taken into account. Although the projects subject to the WCM are already in place, the allocations and uses allowed and established through the WCM revision can have significant influence on overall ACT system health by preventing further fragmentation. If managed to make the best use of these existing resources, further impacts of additional supply infrastructure development could be avoided or at least minimized.

Unimpeded physical continuity of the major ACT rivers with their floodplains, including riparian wetlands, is also controlled in large part—or in the case of the Coosa and Alabama Rivers, nearly completely—by the management approach set forth in Water Control Manuals. Access to floodplains is critical to river sediment and chemical dynamics, hydrating riparian floodplains, and maintaining vegetation and habitat important in the lifecycles of many species, both aquatic and terrestrial, with characteristics adapted to such ecosystems. Managing flows for magnitude, seasonality, and variability that mimic natural conditions such that rivers have regular access to their floodplains is protective of riverine ecosystems and can reduce impacts to wetlands.

Recommendations: EPA recommends that consideration be given to maximizing the use of existing infrastructure in the ACT Basin—in balance with environmental uses such as protection of habitat, aquatic life, and water quality—such that impacts to aquatic resources are on the whole minimized for the basin. If allowing additional uses avoids impacts of new impoundments and additional infrastructure, overall impacts to the basin could be minimized with holistic management. The Mobile District should fully address and document the effects of the proposed actions on wetlands and streams.

Contact – Rosemary Hall - 404/562-9846

Water Supply Efficiency/Conservation

Projects that impact hydrology, such as new or expanded water supply, development, and recreational or amenity impoundments, often require Clean Water Act (CWA) Section 404

permits, making them subject to review for compliance with the Section 404(b)(1) Guidelines. When reviewing such projects, EPA and the USACE must consider whether the applicant has demonstrated adherence to the mitigation sequence, with avoidance and minimization of impacts to aquatic resources as the first two steps, and then ensure that the applicant has evaluated an appropriate range of alternatives and selected the Least Environmentally Damaging Practicable Alternative. For water supply project proposals, full implementation of conservation and efficiency measures, including water reuse options, is a primary alternative that could have a fraction of the impacts to aquatic resources associated with developing new supply infrastructure. When evaluating requests for allocations and uses related to the projects in the ACT Water Control Manual now and in the future, the USACE should consider whether efficiency and conservation measures are in place to ensure that the overall use of USACE lakes minimizes impacts to aquatic resources.

Minimizing supply withdrawals with conservation measures can also reduce conflicts among uses, easing pressure on the ACT system as a whole, and easing management of releases and flows for environmental protection. EPA Region 4's 2010 Guidelines on Water Efficiency Measures for Water Supply Projects in the Southeast ("WEGs") describes conservation and efficiency measures that can be expected of users seeking allocations or withdrawals from the system, and should be used to evaluate how well efficiency is being implemented before committing to new allocations or uses. We especially encourage that any entity seeking allocations demonstrate meaningful efforts to repair leaking infrastructure; use an integrated resource management approach across residential, industrial, agricultural, and commercial settings; implement full-cost pricing, conservation pricing, and metering of all water users; use low-impact development and green infrastructure; facilitate retrofitting of buildings; optimize water reuse; and facilitate landscaping to minimize demand and waste, and implement efficient irrigation practices. Protecting basin flows through conservation and efficient use can reduce impacts to streams and riparian wetlands, aquatic life, habitat, and water quality, and can ease management of system flows, particularly under low-rainfall conditions.

Recommendations: EPA recommends that demonstrated water efficiency/conservation implementation be required before commitments are made for supply/storage. Water quantity planning should consider:
- Decreasing trend in inflows (land use, withdrawals, climate change)
- Reuse opportunities (direct, indirect potable)
- How drought contingency plans will be formally incorporated into NPDES permits
- Cumulative impacts, including reservoirs and other supply projects proposed or under consideration in the basin, as well as interbasin transfers

Contact – Rosemary Hall - 404/562-9846

Water Quality

State water quality standards programs include designated uses, criteria to protect those uses, and an antidegradation policy (CWA Section 303(c); 40 CFR § 131). Section 401 of the CWA additionally protects these water quality standards, requiring state certification that federal activities which may result in any discharge will comply with state water quality standards.

Further, Section 404(b)(1) Guidelines state that no such work shall be permitted if it would cause or contribute to "violations of any applicable State water quality standard" (40 CFR § 230.10(b)(1)), or if it would "cause or contribute to significant degradation of the waters of the United States" (40 CFR § 230.10(c)).

The revised WCM should be consistent with state water quality standards, particularly where the authorized purpose of a dam is water quality. The WCM should provide for the attainment and maintenance of all downstream uses (40 CFR § 131.10 (b)), including the uses in Mobile Bay. Downstream uses including drinking water, recreation, fishing, swimming, shellfish harvesting and aquatic life protection. This should include ensuring compliance with physical parameters (such as pH, temperature, conductivity and dissolved oxygen), biological criteria, chemical parameters, nutrient loadings (including lake nitrogen, phosphorus and chlorophyll standards) and providing the flows necessary for protection of aquatic life. In particular, there are several waters impaired for nutrients in the basin, including Lakes Allatoona, Carters and Weiss. Changes in operations can have substantial impacts on nutrient dynamics (Pinay, Clément, & Naiman, 2002). For example, chlorophyll-a response in Lake Weiss is very sensitive to retention time increases from withdrawals (Maceina & Bayne, 2003). The impacts of the proposed alternative should be evaluated to ensure that flow changes do not contravene nutrient control and total maximum daily load (TMDL) restoration efforts by Alabama Department of Environmental Management and Georgia Environmental Protection Division.

The WCM should provide reasonable assurance that water quality standards will not be violated; consider the impact on reasonable potential to exceed water quality standards as analyzed for National Pollutant Discharge Elimination Systems permits; confirm that TMDL restoration efforts will not be adversely affected; and ensure that reservoir operations will not cause or contribute to water quality impairments or listings.

Since the date of the last WCM revision, the science related to instream flows has evolved significantly. The revision of the WCM provides an opportunity to incorporate the latest science and successful practices for regulating flows to improve water quality, meet designated uses and, where possible, restore the hydrologic condition and ecological integrity of the river system. For instance, ecologists now understand that flows across the range of the natural hydrograph are important for maintaining the structure and function of aquatic ecosystems rather than regulating a river to meet a static low flow target.

Aquatic plant and animal species have evolved life cycle patterns directly tied to the primary components of hydrologic variability: frequency, magnitude, duration, timing and rate of change of natural flows. Every aspect of the lives of aquatic plants and animals is cued by and inextricably linked to the natural variability of our rivers and streams, which is often absent in highly regulated systems. The EPA encourages incorporation of variable flows in the revised WCM, including the seasonal, intra-annual and inter-annual variable flow patterns needed to maintain or restore processes that sustain natural riverine characteristics. Naturally variable flows are also a major determinant of physical habitat in streams and rivers and directly affect biological composition. Modifying flow regimes provides an opportunity to positively alter habitat and influence species diversity, distribution and abundance. Therefore, the EPA

Recommendations: EPA principally supports and defers to FWS on this project. We encourage continued coordination with the FWS regarding the assessment and protection of federally-protected threatened or endangered species. The FEIS should include a summary of the coordination to date between the USACE and FWS, as well as any updated information regarding the assessment and protection of species within the project area.

Contacts: Lisa Gordon 404/562-9317 and Gary Davis 404/562-9239

Flood Impacts

The Corps of Engineers recently issued the *Appropriate Application of Paleoflood Information for the Hydrology and Hydraulics Decisions of the U.S. Army Corps of Engineers*. EPA also notes that one of the rivers along the ACT has resulted in serious flooding impacts to surrounding communities (e.g., flooding has been an historical issue in Rome, Georgia and much of Montgomery, Alabama is located within the floodplain). The Alternatives that feature increased flows should address any additional flooding or changes to the Federal Emergency Management Agency (FEMA)/ National Flood Insurance Program (NFIP) floodplain maps. These communities are members of the NFIP and have officially adopted the Flood Insurance Rate Maps (FIRM) maps. These maps (legally "adopted" by the community) represent where FEMA has delineated both the special flood hazard areas (SFHAs) and the risk premium zones applicable to the community.

Recommendations: EPA understands that Paleoflood information is not relevant for all Hydrology and Hydraulics decisions, but the FEIS should indicate whether the concepts/ recommendations in the USACE document, *Appropriate Application of Paleoflood Information for Hydrology and Hydraulics Decisions of the U.S. Army Corps of Engineers*, were used in the WCM or EIS and how they were used. In addition, the alternatives that feature increased flows should address any additional flooding or changes to the FEMA/NFIP floodplain maps and the FEIS should disclose which Alternatives have impacts to these, and what these changes involve.

Contact: Paul Gagliano 404/562-9373.

Public Safety and Recreation

FERC license renewals have recently resulted in negotiated agreements that include provisions to enhance the recreation and public safety on regulated rivers. For instance, the SCE&G license on the Saluda River included a Warning Safety Enhancement Plan and provisions for Recreational Flow Releases. These revisions were prompted, in part, by hazardous conditions that existed during flow releases that resulted in the loss of life in recreation areas.

Recommendations: EPA suggests that the WCM incorporate new and innovative procedures to enhance warning systems to improve public safety and recreation throughout the system.

Contacts: Lisa Gordon 404/562-9317.

recommends that, where possible, the WCM be designed to mimic the natural conditions as closely as possible in the downstream waters.

Over the past decade, numerous licenses were negotiated and re-issued by the Federal Energy Regulatory Commission (FERC) and river operations have been improved on several USACE operated systems. Many renewed FERC licenses and updated dam operations by the USACE have included advancements in water management and dam operations to better protect and maintain aquatic life. For example, the FERC license issued to South Carolina Electric and Gas (SCE&G) for the operation of the Saluda River includes numerous updated provisions for protection of mussels, sturgeon, trout and rare plant and animal species. The USACE's participation in the Sustainable Rivers project has also resulted in revised dam operations that have improved aquatic life, recreation as well as improved the economic impact for local communities.

EPA would like to reiterate the suggestions provided in the "Draft Fish and Wildlife Coordination Act Report on Water Control Manual Updates for the Alabama – Coosa – Tallapoosa River Basin in Alabama and Georgia" (dated December 2012). EPA suggests the use of multiple endpoints to demonstrate the protection of aquatic life designated uses. Relevant endpoints include floodplain connectivity (inundation, maintenance of off-channel habitats, wetted perimeter, out-of-bank habitats) and habitat suitability analysis. Because of the intensity of the later (e.g. physical habitat simulation), the EPA recommends consulting the relevant wildlife resource agencies to determine which habitat locations are critical to aquatic life in the basin and may warrant prioritized, intensive study.

In addition, EPA recommends that drought contingency plans be formally coordinated with dischargers (especially NPDES permit holders) and water intake permitees (including public drinking water suppliers, cooling water intakes, industrial users, etc.) to ensure that drought operations are adequately considered in permit limits and discharger operations.

Recommendations: EPA recommends analyzing the effects of the WCM operations on water quality standards, with a particular emphasis on physiochemical endpoints such as dissolved oxygen, biological endpoints such as sensitive aquatic species and physical endpoints that protect the designated aquatic life use, including adequate flows to maintain the physical integrity of habitat. EPA also encourages the Mobile District to examine projects, such as the Green River in Kentucky, as examples of USACE improvements in river management. We would welcome the opportunity to follow up and provide additional information on these projects in upcoming weeks.

Contacts: Lisa Gordon 404/562-9317 and Stephen Maurano 404/562-9044.

Aquatic Life and Endangered Species

EPA notes that the U.S. Fish & Wildlife Service (FWS) has been actively engaged in the WCM and DEIS and has submitted two recent comment letters to the USACE regarding the protection of threatened and endangered species within the Basin.

Coordination with FERC Relicensing

FERC relicensing actions are currently underway for the Coosa River projects and APC has requested to modify winter pool levels at the Weiss and Logan Martin Lakes. Plan G (the Preferred Alternative) does not include these proposed modified winter pool levels.

Recommendations: EPA recommends that the USACE include additional information regarding how proposed modifications to the winter pool levels at the Weiss and Logan Martin may affect downstream flows in the Basin and impact the overall operations of the preferred alternatives.

Climate Change:

Adapting to future climate change impacts requires hydroclimate monitoring, prediction and application of such information to support water management decisions. There is an expanding body of literature on the greenhouse gas contributions (CO_2, CH_4, N_2O) of reservoirs (Varis, Kummu, Härkönen, & Huttunen, 2012). Emissions pathways include flux across the air-water interface, from supersaturation in the sediment, releases immediately below the turbines and further downstream (Diem, Koch, Schwarzenbach, Wehrli, & Schubert, 2012).

The potential impacts of climate change on the ACT water budget are manifold: changing precipitation patterns, increased evapotranspiration, and decreased soil moisture. These impacts could be exacerbated by other hydrological modifications such as increased withdrawals and reduced baseflow from impervious surface.

Recommendations: EPA notes that climate change has the potential to impact water supply, water quality, flood risk, wastewater, aquatic ecosystems, and energy production. The FEIS should consider the impact of dam operations in the Basin on greenhouse gases and climate change, as well as the impacts of climate change on WCM operations. EPA recommends an adaptive management approach in response to these impacts.

Contact: Stephen Maurano 404/562-904

Environmental Justice

Pursuant to the executive order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," the EIS examined the effect of the proposed action on minority and/or low-income populations. U.S. Census Bureau information for 2000 was used to identify low-income and minority populations within the Basin. The data indicated that most of the minority populations in the Basin were located in rural small to medium-sized towns in Alabama. The poverty rate in the Alabama portion of the ACT Basin is almost twice as high as the rate found in the Georgia portion of the basin. The DEIS concluded that communities with EJ concerns that use the reservoirs for fishing and recreation could experience some inconveniences due to seasonal fluctuations in the water surface under the No Action Alternative. During extreme drought years, reservoir users including low-income and minority populations could be affected, but less so under the preferred alternative. The preferred alternative would incorporate a new action zone at Carters Lake, revisions to the action zones at

Allatoona Lake, and specific drought management measures for the APC lakes and USACE lakes downstream of Montgomery that may result in more effective management of water surface levels and conservation storage in USACE and APC dams during drought conditions. Public access and use of the lakes should be improved for a longer periods of time. According to the DEIS, no significant environmental justice concerns relative to reservoir water management operations in the ACT Basin were identified during the scoping process for this EIS.

Recommendations: EPA appreciates the demographics analysis that identified low-income and minority populations within the basin and we recommend that the FEIS incorporate a discussion of any changes to the analysis based on more recent 2010 Census information. Based on some of the demographics information, EPA recommends a targeted approach for outreach to communities with EJ concerns, particularly in those areas with higher populations like rural Alabama. Specific efforts that were made to meaningfully engage low-income and minority stakeholder groups or individuals in the public involvement and decision-making process should also be discussed in the FEIS. EPA agrees that access and use of the reservoirs by minority and low-income populations could place more emphasis on shoreline or near-shore access activities like picnicking, wading/swimming, and recreational and subsistence fishing, primarily from the bank or public docks/piers, rather than boating-related activities that might be somewhat less dependent on high lake levels. Low water levels in the lakes would still adversely affect the access and usability of the lake resources. Any efforts to identify EJ populations that may engage in subsistence activities within the basin boundaries (i.e., subsistence fishing) should be discussed in the FEIS. The FEIS should also include a summary of EJ comments or concerns identified during the public involvement process along with agency responses to those concerns and efforts to avoid, minimize or mitigate potential impacts.

Contact: Ntale Kajumba – 404-562-9620

Children's Health

Pursuant to the executive order 12898 EO 13045: "Protection of Children from Environmental Health Risks and Safety Risks," the DEIS examined the environmental health and safety risks associated with this action on children's health. The DEIS indicated that the USACE uses specific measures at operating projects to minimize such risks including implementing water safety and other education programs, providing clear signage, marking designated use areas, removing hazards where appropriate, restricting public access to certain areas designed for authorized personnel, and other activities designed to promote safe use. According to the document, many of these activities are directly focused on children who visit the reservoirs and these health and safety activities are expected to continue and/or be adjusted as needed. The DEIS states that existing water management activities at the reservoirs do not impose any undue risks to children that are not effectively addressed by the above activities and no additional risks would be imposed by the proposed updates to water management practices.

Recommendation: EPA notes that the DEIS has described several measures in an effort to avoid and minimize impacts to users of the reservoir including children. In addition, we again suggest that the reservoirs incorporate new and innovative procedures to enhance warning systems (See public safety measures).

Contacts: Ntale Kajumba- 404-562-9620

References:

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